

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA : INFORMATION  
:  
- v. - : S2 20 Cr. 463 (KPF)  
:  
CHRISTIAN OHAERI, :  
:  
Defendant. :  
:  
- - - - - X

COUNT ONE  
**(Narcotics Conspiracy)**

The United States Attorney charges:

1. From at least in or about May 2019, up to and including at least in or about June 2020, in the Southern District of New York and elsewhere, CHRISTIAN OHAERI, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that CHRISTIAN OHAERI, the defendant, and others known and unknown, would and did distribute, dispense, possess with intent to distribute and dispense, and cause to be distributed and dispensed, a controlled substance outside the scope of professional practice and not for a legitimate medical purpose, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that CHRISTIAN OHAERI, the

defendant, conspired to distribute and dispense, possess with intent to distribute and dispense, and caused to be distributed and dispensed, outside the scope of professional practice and not for a legitimate medical purpose, was a quantity of mixtures and substances containing a detectable amount of oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

**COUNT TWO**  
**(Narcotics Conspiracy)**

The United States Attorney further charges:

4. From at least in or about October 2018, up to and including at least in or about May 2019, in the Southern District of New York and elsewhere, CHRISTIAN OHAERI, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

5. It was a part and an object of the conspiracy that CHRISTIAN OHAERI, the defendant, and others known and unknown, would and did distribute, dispense, possess with intent to distribute and dispense, and cause to be distributed and dispensed, a controlled substance outside the scope of professional practice and not for a legitimate medical purpose, in violation of Title 21, United States Code, Section 841(a)(1).

6. The controlled substance that CHRISTIAN OHAERI, the

defendant, conspired to distribute and dispense, possess with intent to distribute and dispense, and caused to be distributed and dispensed, outside the scope of professional practice and not for a legitimate medical purpose, was a quantity of mixtures and substances containing a detectable amount of buprenorphine, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

**COUNT THREE**  
**(Health Care Fraud)**

The United States Attorney further charges:

7. From at least in or about September 2018, up to and including at least in or about July 2022, in the Southern District of New York and elsewhere, CHRISTIAN OHAERI, the defendant, knowingly and willfully executed, and attempted to execute, a scheme and artifice to defraud a health care benefit program, as that term is defined in Title 18, United States Code, Section 24(b), and to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, a health care benefit program, namely Medicaid, in connection with the delivery of and payment for health care benefits, items, and services, and did aid and abet the same, to wit, OHAERI, in order to fraudulently obtain payments from health care benefit programs to which he was not entitled, submitted and caused to be submitted to health care

benefit programs claims for prescriptions that were dispensed, or were not in fact dispensed, outside the scope of professional practice and not for a legitimate medical purpose.

(Title 18, United States Code, Sections 1347 and 2.)

**FORFEITURE ALLEGATIONS**

8. As a result of committing the offenses alleged in Counts One and Two of this Information, CHRISTIAN OHAERI, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

9. As a result of committing the offense alleged in Count Three of this Information, CHRISTIAN OHAERI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), any and all property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Asset Provision**

10. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

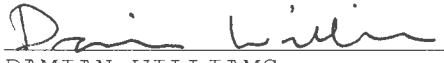
c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

  
DAMIAN WILLIAMS  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

CHRISTIAN OHAERI,

Defendant.

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(21 U.S.C. §§ 841(a)(1),  
841(b)(1)(C), and 846; 18 U.S.C.  
§§ 1347 and 2.)

DAMIAN WILLIAMS  
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United States Attorney

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